

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION - CLEVELAND

)
IN RE:) CASE NO. 10-13502
)
Boban Nikolic) CHAPTER 13
Gloria Jean Nikolic)
Debtors) JUDGE Pat E. Morgenstern-Clarren
)) **OBJECTION TO CONFIRMATION**
)) **OF THE CHAPTER 13 PLAN**
)

Now comes Ford Motor Credit Company LLC, a creditor herein holding a secured claim in the with in proceedings, by and through counsel, pursuant to 11 U.S.C, Section 1324 and objects to the confirmation of the plan, based upon the proposed valuation of the collateral for the following reasons:

1. The within case was filed on April 16, 2010 and is governed by BAPCPA of 2005.
2. Creditor has a security interest in a 2010 Ford Fusion, VIN#3FAHP0KC6AR146643.
3. On September 21, 2009, the Debtors listed above (collectively, the "Debtor") obtained a loan from Movant for the purchase of said 2010 Ford Fusion, VIN#3FAHP0KC6AR146643.
4. The monthly payment amount is \$421.39 and Creditor is owed \$19,805.33.

5. The debt was incurred within the 910-day period preceding the filing of the case; therefore, pursuant to 11 U.S.C. § 1325(a) Creditor should be paid in full in the amount of \$19,805.33 together with interest at the rate mandated by In re Till, 541 US 465,124 S Ct.1951.

6. The objection that is raised herewith is a standing objection and shall continue with reference to the currently proposed plan and any subsequently modified plan or plans.

WHEREFORE, Creditor prays that this Court deny confirmation of the Debtor(s) proposed Chapter 13 Plan.

/s/ Cynthia A. Jeffrey
REIMER, ARNOVITZ, CHERNEK &
JEFFREY CO., L.P.A.
BY: Cynthia A. Jeffrey #0062718
BY: Edward A. Bailey #0068073
P.O. Box 968
Twinsburg, Ohio 44087
Phone: 330-425-4201
Fax: 330-425-2155
Attorneys for Movant

Notice of Hearing

Parties in interest shall take notice that the within Objection of Ford Motor Credit Company LLC to Confirmation of Chapter 13 Plan shall come on for hearing on February 1, 2011 at 8:30 a.m., in conjunction with the confirmation hearing in the within matter.

/s/ Cynthia A. Jeffrey

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CERTIFICATE OF SERVICE

A copy of the foregoing Objection was served on the following registered CM/ECF participants, electronically through the Court's transmission facilities at their email addresses listed on the COURTS ELECTRONIC MAIL NOTICE LIST.

1. Office of the U.S. Trustee
Served via: (registered address)@usdoj.gov
2. Craig H. Shopneck, Trustee
Served via: ch13shopneck@ch13cleve.com
3. William Balena, Esq.
Served via: bbalena@mac.com

I hereby certify that the following were served by mailing on January 4, 2011 the same by ordinary U.S. mail, postage prepaid, to the persons listed below:

1. Boban Nikolic
Gloria Jean Nikolic, Debtors
9040 Calista Dr.
North Ridgeville, OH 44039

/s/ Cynthia A. Jeffrey

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